Issues for ART
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Main Document

Issue: Analysis of alternatives 2D, 2E, and 3H may be inadequate because the assumption leading to their elimination may be unfounded. The assumption, crudely stated, is the more shallow water habitat, the better. Work w/D. Dawiel.

Issue: The document does not quantify how existing supplies would be made more reliable by the program. The main volume of the EIR/S should present a clear discussion of the water supply benefits of the program relative to statewide water needs.

Issue: The discussion of groundwater overdraft in the main document is written to shift the burden of mitigating impacts of the CALFED program to local water agencies. It clarification

ERP

Issue: The potential impacts to recreation need to be addressed. Impacts may result from the ERP, the levee program, and facility construction.

Levee Program

Issue: Long-term protection of Suisun Marsh levees is not included in the Levee Program.

Water Use Efficiency

Issue: The document is overly optimistic regarding the water supply benefits associated with water conservation, wastewater recycling and water transfers. The conservation amounts used in CALFED's no-action alternative assume lifestyle changes and development of technology that currently does not exist.

Issue: CALFED's policy approach for the Water Use Efficiency Program is fundamentally flawed. It should be approached technically or as a combination of both technical and policy. One of the weakest areas in conservation today is the lack of adequate date and analytical review to evaluate what conservation can and cannot do, and accurate quantification of potential water savings and their costs due to conservation.

Conceptual Models

The Strategic Plan Core Team will be developing conceptual models to explain certain concepts related to ecosystem restoration, drinking water quality, and other areas. It is my understanding that some issues requiring resolution are to be addressed using these conceptual models. If so, these models should address:

- 1) The potential for extensive development of shallow water habitat and aquatic habitat to lead to conditions detrimental to native species because of increased water temperatures, increased predation by non-native species, and increased water hyacinth growth and define a response to these conditions should they occur.
- 2) The relationship of high-nutrient concentrations, low dissolved oxygen levels, and the Stockton Deep-water Ship Channel to habitat conditions in the San Joaquin River.
- 3) The significance of turbidity and total organic carbon to aquatic habitat in the Delta and quality of drinking water supply.